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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 UNITED STATES OF AMERICA,
10 Plaintiff,

NO. CR22-5026-RJB

INFORMATION

12 v.

14 LARRY DEAN CRAIG, JR.,
15 Defendant.

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17 The United States Attorney charges that:

18 **Count 1**

19 **(Possession of Child Pornography)**

20 In or about April 2021, in Pierce County, within the Western District of
21 Washington, and elsewhere, LARRY DEAN CRAIG, JR., knowingly possessed matter
22 that contained visual depictions, the production of which involved the use of minors
23 engaging in sexually explicit conduct and the visual depictions were of such conduct, that
24 had been mailed and shipped and transported in and affecting interstate and foreign
25 commerce by any means, including by computer, and which had been produced using
26 materials that had been mailed and shipped and transported in and affecting interstate and
27 foreign commerce by any means, including by computer, and the depictions of child
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1 pornography involved include images of a prepubescent minor and a minor who had not
 2 attained 12 years of age.

3 All in violation of Title 18, United State Code, Section 2252(a)(4)(B), (b)(2).

4 **FORFEITURE ALLEGATION**

5 The allegations contained in Count 1 of this Information are hereby realleged and
 6 incorporated by reference for the purpose of alleging forfeitures to the United States
 7 pursuant to Title 18, United States Code, Section 2253(a). Upon conviction of the offense
 8 alleged in Count 1, the defendant LARRY DEAN CRAIG, JR. shall forfeit to the United
 9 States, pursuant to Title 18, United States Code, Section 2253(a), all property he used to
 10 commit or to facilitate his commission of the offense, any proceeds of the offense, and
 11 any data files consisting of or containing visual depictions within the meaning of Title 18,
 12 United States Code, Section 2253(a)(1). This property includes, but is not limited to:

- 13 a. One Samsung smartphone seized from the defendant on or about April
 14 2021; and,
- 15 b. One red USB thumb drive seized from the defendant or about April 2021.

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 17 **Substitute Assets.** If any of the forfeitable property described above, as a result of
 18 any act or omission of the defendant,

- 19 a. cannot be located upon the exercise of due diligence;
- 20 b. has been transferred or sold to, or deposited with, a third party;
- 21 c. has been placed beyond the jurisdiction of the Court;
- 22 d. has been substantially diminished in value; or,
- 23 e. has been commingled with other property which cannot be divided without
 24 difficulty;

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title
3 21, United States Code, Section 853(p).

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5 DATED this 1st day of February, 2022.

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9 *Sarah Cf. Vogel, for*

10 NICHOLAS W. BROWN

United States Attorney

11 *s/ Matthew P. Hampton for*

12
13 GRADY J. LEUPOLD

Assistant United States Attorney

14
15 *s/ Matthew P. Hampton*

16 MATTHEW P. HAMPTON

Assistant United States Attorney